



# GUIDE TO MAKING AND SELLING PET FOOD & PET TREATS

**Missouri Feed & Seed Program**  
*Agriculture.Mo.Gov*



*Our Goal* is to bring awareness of laws, regulations, & standards for manufacturing and selling pet food & treats.

*This Applies* to anyone who wants to product pet food/treat in their own home or in a commercial facility.

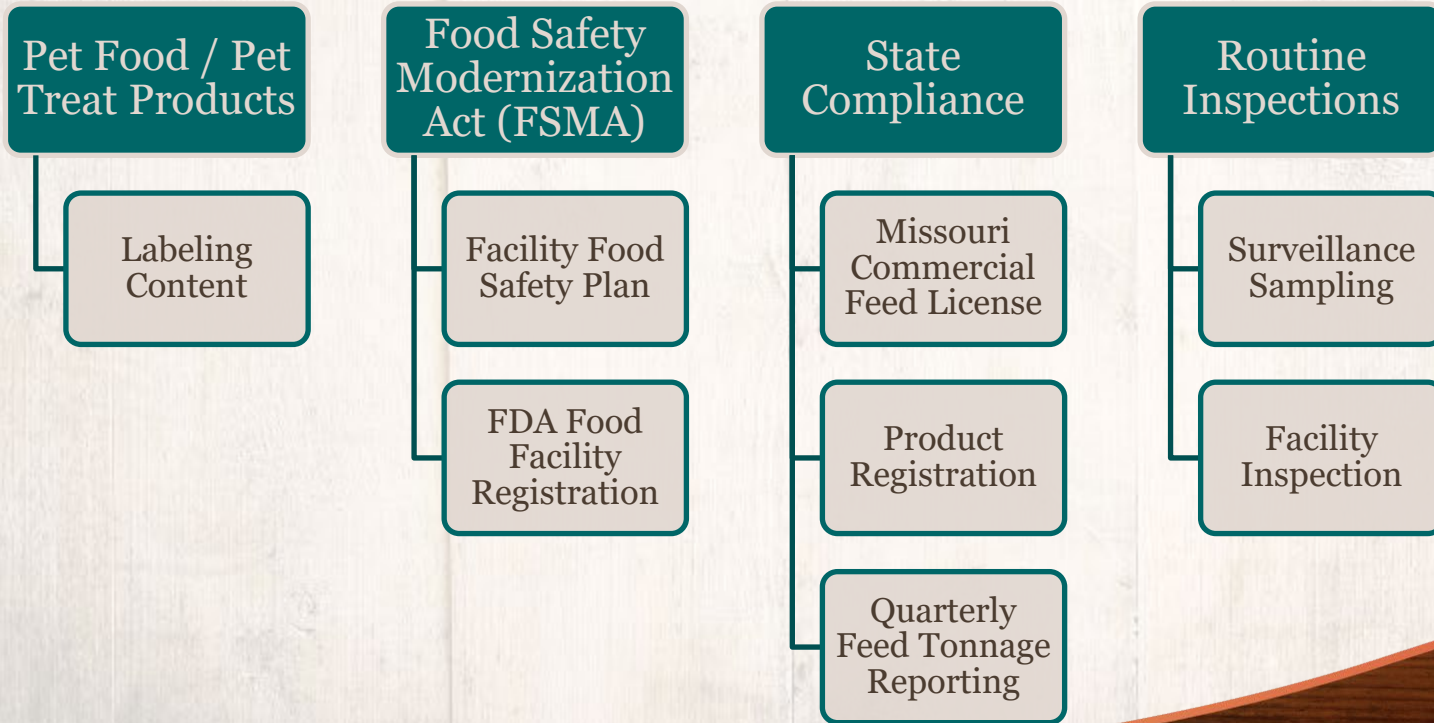
# LET'S GET STARTED...

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# Navigate Through Product Compliance



# Types of Pet Products



## Pet Food:

- Complete and balanced diet
- Fed for nutritional aspects



## Pet Treat:

- Fed as a reward
- Some nutritional benefit but not sole source
- Biscuits, cookies, bars, etc.



## Pet Toy:

- Not regulated as a feed product\*
- Little/no nutritional benefit: primary intent is for entertainment
- Bones, raw hides, etc.

\*If adulterated or labeled with nutritional information, it will be regulated as a feed product.



# Pet Food Label Contents

## Overview

1. Product name
2. Intended species
3. Guaranteed analysis
4. Calorie content
5. Ingredient list
6. Feeding directions
7. Nutritional adequacy (AAFCO) statement\*
  - \*not required on pet treat labels
8. Quantity statement
9. Guarantor information

**1**

# Gordon's Generic

## Dog Food

**2**

**3** **Guaranteed Analysis**  
Crude Protein (min)...27%  
Crude Fat (min).....12.5%  
Crude Fiber (max).....9%  
Moisture (max).....13%

**5** **Ingredients:** Chicken, Brown Rice, Peas, Carrots, Chicken Meal, Sunflower Oil, Calcium Carbonate, Vitamin A, Vitamin D3, Folic Acid, Vitamin B12

**6** **Feeding Directions:**

2-12 lbs.	1/2—1 1/4 cup	50-80 lbs.	2 3/4—3 1/2 cup
12-25 lbs.	1 1/4—2 cup	80-100 lbs.	3 1/2—4 1/2 cup
25-50 lbs.	2—2 3/4 cup	100+ lbs.	4 1/2—5 3/4 cup

These are quantity suggestions. Free choice feeding is recommended for pregnant or nursing females. The amount you feed to your dog will vary depending on breed, age, and activity.

**4** **Calorie Content (calculated ME)**  
3,946 kcal/kg  
378 kcal/cup

**7**

Gordon's Generic Dog Food is formulated to meet the nutritional levels established by the AAFCO Dog Food Nutrient Profiles for all life stages including growth of large size dogs (70 lbs. or more as an adult).



**8** **Net Weight 2 lb. (907.2g)**

**9** **Gordon's Pet Food Company**  
1616 Missouri Blvd  
Jefferson City, MO 65109







# Required Label Content Explained



3	
<b>Guaranteed Analysis</b>	
Crude Protein (min)...	27%
Crude Fat (min).....	12.5%
Crude Fiber (max).....	9%
Moisture (max).....	13%

1. Product name
  - Must be shown on the Principal Display Panel (PDP)
  - May include brand name
2. Intended Species
  - Must be written; a photo of an animal on the packaging is not sufficient by itself
3. Guaranteed Analysis
  - Products must be analyzed by an animal feed testing laboratory to develop a Guaranteed Analysis
  - Must be listed in this order:
    - Crude Protein (minimum)
    - Crude Fat (minimum)
    - Crude Fiber (maximum)
    - Moisture (maximum)
    - *Voluntary guarantees may be listed following moisture*



# Required Label Content Explained (cont.)

## 4. Calorie Content\*

- Measured in terms of metabolizable energy (ME) on an 'as fed' basis
- Must be expressed as kcal/kg AND kcal/familiar household unit (i.e., cups, cans, ounces, treats, etc.)
- \*Calorie content is not required in the State of Missouri (but it is recommended!)

### Calorie Content (calculated ME)

4 3,946 kcal/kg  
378 kcal/cup

## 5. Ingredient Statement

- Ingredients must be listed in descending order of predominance by weight
- Must be listed using the official feed terms as defined in the AAFCO Official Publication, 21 CFR 573, FDA GRAS, or the Common Food Index

5 **Ingredients:** Chicken, Brown Rice, Peas, Carrots, Chicken Meal, Sunflower Oil, Calcium Carbonate, Vitamin A, Vitamin D3, Folic Acid, Vitamin B12

### Feeding Directions:

2-12 lbs.	1/2–1 1/4 cup	50-80 lbs.	2 3/4–3 1/2 cup
12-25 lbs.	1 1/4–2 cup	80-100 lbs.	3 1/2–4 1/2 cup
25-50 lbs.	2–2 3/4 cup	100+ lbs.	4 1/2–5 3/4 cup

6 These are quantity suggestions. Free choice feeding is recommended for pregnant or nursing females. The amount you feed to your dog will vary depending on breed, age, and activity.

## 6. Feeding Directions

- Describes how the product is intended to be offered
- Feeding frequency may be stated



# Required Label Content Explained (cont.)

7. Gordon's Generic Dog Food is formulated to meet the nutritional levels established by the AAFCO Dog Food Nutrient Profiles for all life stages including growth of large size dogs (70 lbs. or more as an adult).

8. Net Weight 2 lb. (907.2g)

9. Gordon's Pet Food Company  
1616 Missouri Blvd  
Jefferson City, MO 65109

7. Nutritional Adequacy (AAFCO) Statement
  - Not required on pet treat labels
  - 2 CSR 70-31.020 gives specific wording allowable
8. Quantity Statement
  - Net weight or volume of the product package
  - Must be listed on the lower 30% of PDP
  - Must be represented in standard and metric units, or by count
9. Guarantor Information
  - Must include business name, street address, city, state, and zip code
  - May omit street address if the business address is listed in a current city or telephone directory







# Who Is AAFCO?

## The Association of American Feed Control Officials

<https://www.aaftco.org/>

<https://www.aaftco.org/resources/startups/>

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1. AAFCO sets the standards of regulatory & labeling requirements for animal food

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2. AAFCO has no regulatory authority for pet products. All authority is held by State and Federal entities

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3. Many states have adopted part or all AAFCO's Model Regulations into their laws. Missouri has adopted some, but not all the Model Regulations

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4. State feed control officials are responsible for pet food to determine compliance of:

- manufacturers
  - distributors
  - guarantors
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AAFCO resources  
available for new  
startups!

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# Food Safety Modernization Act (FSMA) Requirements:



## Register as an Animal Food Facility

\*Does not apply to manufacturers  
operating in their primary residence



## Develop a Food Safety Plan including:

- Facility information
- Hazard analysis
- Processing Current Good Manufacturing Practices (cGMP)
- Preventative controls
- Record keeping procedures
- Recall plan



## For more information:

FSMA Registration Guide: [FSMA Guide](#)  
cGMP: [Title 21 CFR 507](#)


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# Missouri Commercial Feed License

- Anyone who manufactures, distributes, or labels pet food/treats within or into the state **must obtain** a Missouri Commercial Feed License
  - Any retail only facility (selling only pet products which are labeled from a licensed facility) does not require a feed license
  - Annual license fee is \$35.00 
  - Commercial feed licenses are active from July 1<sup>st</sup> – June 30<sup>th</sup>
- Printable application: [Application PDF](#)
- Apply online: [MOPlants](#)



# Annual Product Registration

- 'Pet' = dog or cat
- Each product sold in packages of **10 lbs. or less** must be registered
- \$90 per product\*

- 'Specialty pet' = normally maintained in a cage or tank (lizard, fish, hamster, parakeet, etc.)
- Each product sold in packages of **1 lb. or less** must be registered
- \$90 per product

*Pet Food & Treats*



*Specialty Pet Food & Treats*



# Annual Product Registration (cont.)

- **Payment is required by January 1<sup>st</sup> of each year**
  - If payment is postmarked after January 31<sup>st</sup>, a 50% late fee will be added
  - [Click here](#) for a printable product registration form
- **\*FEE EXCEPTION for pet food/treats:**
  - If a firm's TOTAL gross annual sales do not exceed \$5,000, the firm can be considered for a reduced product registration fee of \$25 per product. Documentation is required to substantiate that the firm meets requirements for the reduction in fee. Contact our office for more information.



# Does my Product Count as a Single Product or Multiple?

Products are considered one product if the label of each package size has the following *identical* information:

☒ Product Name\*

\*Variety packs or a distinct label statement for a specific breed / size of pet = different products

☒ Feeding  
Directions

☒ Guarantor

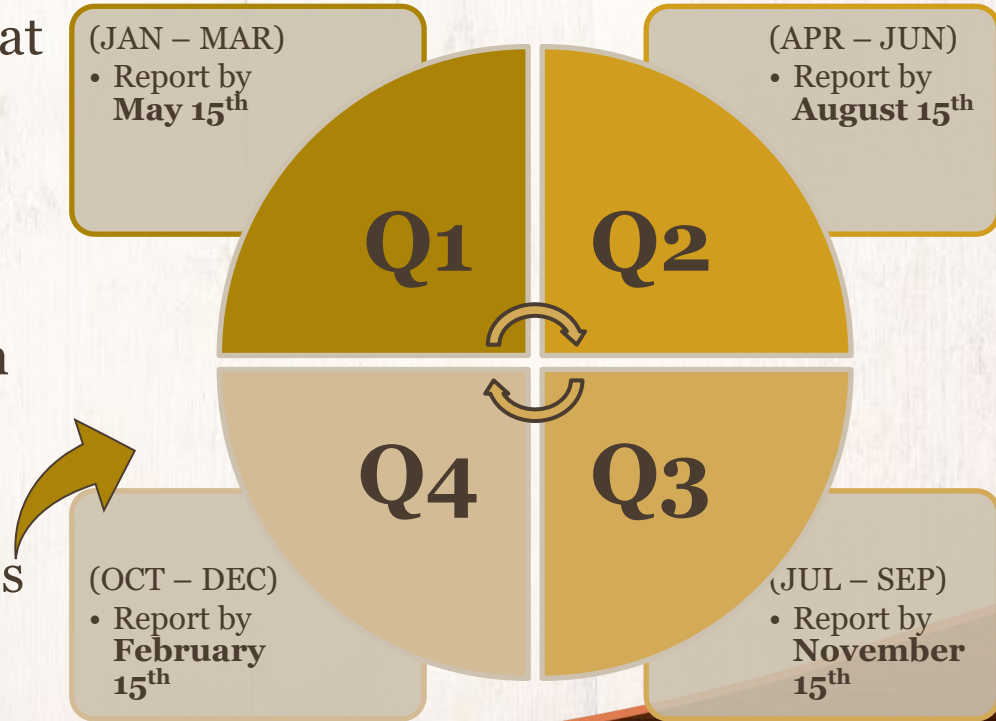
☒ Ingredients /  
Formula

☒ Guaranteed  
Analysis



# Feed Tonnage Report

- All other product sold that does not meet the requirements of product registration must be reported on a quarterly tonnage report
- Tonnage fee is \$0.14/ton or \$5.00 quarterly minimum, whichever is greater
- Tonnage report due dates



# Inspections

- The Missouri Feed & Seed Program has **seven inspectors** assigned across the state to help regulate feed laws and regulations
- **Inspectors are authorized to enter places of business, including:**
  - Manufacturing sites
  - Warehouses
  - Feed Mills
  - Retail Stores
- **Inspections may include (but are not limited to):**
  - Surveillance product sampling (monitoring safety and quality)
  - Verify recordkeeping
  - Good manufacturing practices (cGMP's)
  - Determination of compliance (i.e., licensing, registration, labeling, etc.)
- **[Click here](#) for a map of inspectors by county of coverage**





# Resources

- State Laws & Regulations
  - Applications
  - MOPlants
- FDA: CFR Title 21
  - FSMA
- AAFCO: aafco.org
  - Startup Business
  - OP Chapter 6
  - Resources
- Contact the Feed & Seed Program:
  - Pet Food Website
  - Office: (573) 751-4310
  - Email: FSTT@mda.mo.gov
- Inspector area map





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